

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

1) CARRIE LATIF,)
Plaintiff,)
)
v.) Case No. CIV-17-1271-M
)
1) LEISURE TIME RV, LLC,) Removed from the District Court of
Defendant.) Oklahoma County, Case No. CJ-2017-6583

NOTICE OF REMOVAL

Defendant Leisure Time RV, LLC, pursuant to 28 U.S.C. §§ 1331, 1441, 1446, hereby removes the above-captioned action currently pending in the District Court of Oklahoma County, Oklahoma to the United States District Court for the Western District of Oklahoma. The grounds for removal are as follows:

1. Plaintiff Carrie Latif (“Plaintiff”) commenced this action, entitled *Latif v. Leisure Time RV, LLC*, Case No. CJ-2017-6583 (“the Action”), by filing a Petition in the District Court of Oklahoma County on November 16, 2017.
2. Under 28 U.S.C. §§ 116(c), 1446(a), the United States District Court for the Western District of Oklahoma is the appropriate court for filing this Notice of Removal.
3. Pursuant to 28 U.S.C. § 1446(a) and Local Rule 81.2, a copy of the Oklahoma County District Court docket sheet is attached as Exhibit 1 and copies of all process, pleadings, or other filings are attached as Exhibits 2 (Petition), 3 (Entry of Appearance), and 4 (Summons).
4. Defendant Leisure Time RV, LLC (“Leisure Time”) is the sole defendant in the Action.

5. The Petition alleges claims of sex discrimination and sexual harassment, in violation of Title VII of the Civil Rights Act of 1964, 48 U.S.C. § 2000e *et seq.* Petition, attached as Exhibit 2, at 1.
6. As Plaintiff's claims "aris[e] under the Constitution, laws, or treaties of the United States," this Court has original jurisdiction over them. 28 U.S.C. § 1331.
7. The Petition further alleges that the claims arose in Oklahoma County, Oklahoma. *Id.*
8. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1391(b), 1441(a).
9. Defendant was served with a summons and a copy of the Petition on November 20, 2017 by mail to its registered agent for service of process.
10. Pursuant to 28 U.S.C. § 1446(b)(1), this Notice of Removal is filed within 30 days after Defendant's receipt of "the initial pleading setting forth the claim for relief upon which such action or proceeding is based," and so this Notice of Removal is timely filed.
11. Defendant reserves the right to amend or supplement this Notice of Removal.
12. Pursuant to 28 U.S.C. § 1446(d), written notice of the filing of this Notice of Removal will be given to Plaintiff and the District Court of Oklahoma County, Oklahoma promptly after the filing of this Notice of Removal.
13. At present, there are no pending motions or discovery requests.

WHEREFORE Defendant Leisure Time RV, LLC removes the Action to this Court pursuant to 28 U.S.C. §§ 1331, 1441, 1446 and invokes this Court's jurisdiction.

Respectfully submitted this 27 day of November, 2017.

/J. Christopher Davis

J. Christopher Davis, OBA No. 16639

Jason L. Callaway, OBA No. 31958

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Attorneys for Defendant

Leisure Time RV, LLC

CERTIFICATE OF SERVICE

This is to certify that on November 27, 2017, the undersigned caused a true and correct copy of the above and foregoing to be served by:

- X First class mail, postage pre-paid;
 Certified mail, return receipt requested;
 Hand-delivery;
 Facsimile;
 E-mail.

Upon all Counsel or Parties of Record:

D. Colby Addison, OBA # 32718

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/ J. Christopher Davis